

# Exhibit 17

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SANDRA GUZMAN, )  
 )  
 Plaintiff, )  
 )  
 vs. ) 09CIV9323  
 ) (BSJ(RLE)  
NEWS CORPORATION, NYP HOLDINGS, )  
 INC., d/b/a THE NEW YORK POST, )  
 and COL ALLAN, in his official )  
 and individual capacities, )  
 )  
 Defendants. )  
 -----)

VIDEOTAPED DEPOSITION OF EBONY CLARK  
New York, New York  
Wednesday, May 30, 2012

Reported by:  
Philip Rizzuti  
JOB NO. 50101

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1 Clark  
 2 first office and he was sitting down, like I  
 3 said he was looking out the window. When I  
 4 went into his office he was standing up  
 5 looking out the window, he made the comment, I  
 6 did what I had to do and then I left.  
 7 Q. What position was he in when he  
 8 made the comment?  
 9 A. I believe he was looking out the  
 10 window.  
 11 Q. Do you know for sure that he was  
 12 looking at the window?  
 13 A. From my memory, yes, he was  
 14 looking out the window.  
 15 Q. Was he sitting or standing when he  
 16 made the comment?  
 17 A. He was standing.  
 18 Q. Was that after or before you made  
 19 eye contact with Mr. Allan?  
 20 A. I don't remember.  
 21 Q. And tell me again what you heard  
 22 Mr. Allan say?  
 23 A. I heard him say that the -- that  
 24 the people were not smart and that the  
 25 majority of them are minorities.

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1 Clark  
 2 many of these people are not smart. And  
 3 second, the majority of them are minorities,  
 4 end quote.  
 5 Is that your best recollection of  
 6 what Col Allan said that day?  
 7 A. Yes.  
 8 Q. In the first page of this document  
 9 you wrote, it is the second paragraph:  
 10 Delonas, Col Allan, Jesse Angelo, Frank Zini,  
 11 Joseph Robinowitz and many other insensitive  
 12 editors defends this quote, art, end quote.  
 13 Do you see that?  
 14 A. Yes.  
 15 Q. What did you hear Sean Delonas  
 16 say?  
 17 A. I didn't hear him say anything,  
 18 however Shari was exchanging words with those  
 19 editors that I mentioned here, except for Col  
 20 Allan, I don't know if she exchanged words  
 21 with him. But I was present when they were  
 22 exchanging words, and basically she was just  
 23 telling them how do they think that that is  
 24 art, and that it is offensive and stuff like  
 25 that. And they were going back and forth

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1 Clark  
 2 Q. And is this your best recollection  
 3 of what Mr. Allan said?  
 4 A. Yes.  
 5 Q. And that is what you wrote in this  
 6 document that has been marked as Clark Exhibit  
 7 11; right?  
 8 A. Uh-hum.  
 9 Q. We actually need a verbal answer  
 10 to the last question, Ebony.  
 11 This is your best recollection of  
 12 what Mr. Allan said?  
 13 A. Yes.  
 14 Q. And that is what you wrote in the  
 15 document that has been marked as Clark Exhibit  
 16 11?  
 17 A. Yes.  
 18 Q. I would like you to look at Clark  
 19 Exhibit 11, the page that is the second to  
 20 last page, it is Bates stamped NYP 1656, do  
 21 you see that towards the bottom?  
 22 A. Yes.  
 23 Q. You said: Midday as I entered  
 24 Col's office I heard him speaking into the  
 25 phone to an unknown person quote, number 1,

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1 Clark  
 2 about the cartoon and what they felt and she  
 3 said what she felt.  
 4 Q. Shari Logan has already been  
 5 deposed in this matter and we have her  
 6 personal recollection, and today I want to  
 7 find out your personal recollection of what  
 8 happened. So tell me what you personally  
 9 heard Sean Delonas say?  
 10 A. I didn't hear Sean say anything.  
 11 Q. Have you ever met Sean Delonas?  
 12 A. I have not.  
 13 Q. Is Sean Delonas an employee of the  
 14 New York Post?  
 15 A. I believe so, yes. He is the  
 16 cartoon artist.  
 17 Q. Do you know for sure that he is  
 18 employed by the New York Post?  
 19 A. From what I remember when I was  
 20 doing the work for Carolyn like I said when  
 21 she was not there on certain days and I would  
 22 go to get the cartoon, I believe that he did  
 23 call in one time because I think he was late  
 24 with delivering the cartoon and he wanted to  
 25 make sure that I received it. So I may have